

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Civil Action No. 05-CV-10879-JLT

KIMBERLY GENEREUX,)	
Plaintiff)	
)	
v.)	PLAINTIFF'S MOTION TO EXTEND
)	TIME TO OPPOSE DEFENDANTS'
)	<u>MOTION FOR SUMMARY JUDGMENT</u>
COLUMBIA SUSSEX CORPORATION,)	
STARWOOD HOTELS & RESORTS)	<u>(ASSENTED TO)</u>
WORLDWIDE, INC., and)	
WESTIN HOTEL MANAGEMENT, L.P.,)	
Defendants)	

Kimberly Genereux, the plaintiff, hereby moves this Court to extend the time for her to oppose the defendants' Motion for Summary Judgment by three days, so that the opposition is due on Friday, March 28, 2008, rather than Tuesday, March 25, 2008.

In support of her Motion, the plaintiff states that opposing the defendants' motion has required her to review multiple cartons of documents and transcripts and to review and brief numerous foreign authorities within two weeks. The defendants had alerted the Court of their intention to file the motion on January 30, 2008 and filed it on March 11, 2008; six weeks later and eight days after they received the report of the plaintiff's security expert witness. The plaintiff respectfully requests a brief extension of less than one week to complete the assembly and scanning for electronic filing of her opposing materials.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

On March 24, 2008, I, Mark F. Itzkowitz, counsel for the plaintiff, discussed and reviewed the foregoing motion with

Attorney John B. Johnson, counsel for the defendants, and could not resolve the issue as the defendants would not agree to any extension.

The Plaintiff,
By her Attorney,

MARK F. ITZKOWITZ (BBO #248130)
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Suite 1000
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March 24, 2008

CERTIFICATE OF SERVICE

I, Mark F. Itzkowitz, counsel for the plaintiff, hereby certify that on this date, I made service of the within document by serving it electronically to registered ECF participants and/or by mailing/faxing/hand-delivering a copy of same to non-registered ECF participants as indicated on the Notice of Electronic Filing ("NEF"), upon the following counsel of record:

John B. Johnson, Esquire
Corrigan, Johnson & Tutor, P.A.
141 Tremont Street
Boston, MA 02111; and

Robert J. Brown, Esquire
Mendes & Mount, LLP
750 7th Avenue
New York, NY 10019-6829.

s/ Mark F. Itzkowitz
MARK F. ITZKOWITZ (BBO #248130)

Dated: March 24, 2008